

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VIATECH TECHNOLOGIES, INC.,)
)
Plaintiff,)
)
v.) C.A. No. 17-570-RGA-SRF
)
MICROSOFT CORPORATION,)
)
Defendant.)

**JOINT STIPULATED AMENDMENT TO THE
PROTECTIVE ORDER FOR SOURCE CODE REVIEW (D.I. 56)**

This Joint Stipulated Amendment to the Protective Order for Source Code Review amends the Protective Order entered on the Docket at D.I. 56 as follows:

1. In view of social distancing and travel restrictions caused by COVID-19 and the fact that Microsoft's counsel's offices are not open to allow in-person code review, and further in view of ViaTech's requests for additional review of source code, and in the interests of facilitating this review without further delay of the case schedule, the parties agree that the source code review requested by ViaTech for October 20 may be provided via a secure laptop delivered to ViaTech's expert that will securely connect to a remote server which will house the source code for review. ViaTech agrees that the review will take place either in the expert's home or at the offices of ViaTech's outside counsel and in a manner that ensures the security and confidentiality of the code being reviewed.

2. Remote Review will be permitted between the hours of 8am and 5pm Pacific time, unless otherwise agreed in writing between the parties.

3. No expert or counsel for the reviewing party will take pictures of the source code displayed on the review computer or otherwise attempt to circumvent the security of the source code review computer or confidentiality of the source code displayed.

4. The parties further agree that additional modifications to the procedures for source code review may be made by agreement if those modifications are confirmed by both parties in writing.

5. These terms supplement the Protective Order at D.I. 56 and all terms in that Protective Order remain in full force and effect.

ASHBY & GEDDES

/s/ Andrew C. Mayo

John G. Day (#2403)
Andrew C. Mayo (#5207)
500 Delaware Avenue, 8th Floor
P.O. Box 1150
Wilmington, DE 19899
(302) 654 1888
jday@ashbygeddes.com
amayo@ashbygeddes.com

Attorneys for Plaintiff ViaTech Technologies, Inc.

FISH & RICHARDSON P.C.

/s/ Martina Tyreus Hufnal

Martina Tyreus Hufnal (#4771)
222 Delaware Avenue, 17th floor
P.O. Box 1114
Wilmington, DE 19801
Tel: (302) 652-5070
hufnal@fr.com

Attorneys for Defendant Microsoft Corporation